

# EXHIBIT B

1 **LABATON KELLER SUCHAROW LLP**

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7 *Lead Counsel to Securities Lead Plaintiff and*  
8 *the Class*

9 **MICHELSON LAW GROUP**

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13 *Local Bankruptcy Counsel to Securities Lead*  
14 *Plaintiff and the Class*

15 **UNITED STATES BANKRUPTCY COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **SAN FRANCISCO DIVISION**

18 In re:

19 PG&E CORPORATION

20 - and -

21 PACIFIC GAS AND ELECTRIC  
22 COMPANY,

23 Debtors.

- 24 ☒ Affects Both Debtors  
25 ☐ Affects PG&E Corporation  
26 ☐ Affects Pacific Gas and Electric Company

27 **LOWENSTEIN SANDLER LLP**

28 Michael S. Etkin (*pro hac vice*)  
Andrew Behlmann (*pro hac vice*)  
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One Lowenstein Drive  
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*Special Bankruptcy Counsel to Securities*  
*Lead Plaintiff and the Class*

Case No. 19-30088 (DM) (Lead Case)  
Chapter 11  
(Jointly Administered)

**DECLARATION OF GREG TRUJILLO**  
**IN SUPPORT OF MOTION FOR CLASS**  
**CERTIFICATION**

1 I, Greg Trujillo, declare as follows:

2 1. I respectfully submit this declaration on behalf of the Public Employees Retirement  
3 Association of New Mexico (“PERA”), in support of its motion for class certification (the  
4 “Motion”). I am the Executive Director for PERA. Further, I have personal knowledge of the  
5 statements herein and, if called upon as a witness, could and would competently testify thereto.  
6 PERA seeks appointment as a Class Representative in this action, and I am duly authorized by  
7 PERA to take all necessary steps to seek this appointment.<sup>1</sup>

8 2. PERA provides pension benefits for state and local public employees in New  
9 Mexico.

10 3. PERA’s transactions in PG&E Corp. Class A common stock during the period from  
11 April 29, 2015 through November 15, 2018 (the “Class Period”) are reflected in Exhibit A,  
12 attached hereto.

13 4. PERA’s transactions in Pacific Gas & Electric Co. bonds during the Class Period  
14 are reflected in Exhibit B, attached hereto.

15 5. PERA did not purchase or acquire securities of PG&E at the direction of counsel  
16 or in order to participate in any private action under the federal securities laws.

17 6. On behalf of PERA, I, along with my colleagues, agree to monitor the progress of  
18 this litigation. I, along with my colleagues, conferred and will continue to confer with Court-  
19 appointed lead counsel Labaton Keller Sucharow LLP (“LKS”). For example, we have and will  
20 continue to receive and review court filings, including, but not limited to, the Third Amended  
21 Consolidated Class Action Complaint (District Court ECF No. 121) and legal briefs. I, along with  
22 my colleagues, have and will continue to regularly confer with LKS regarding periodic litigation  
23 updates.

24 7. PERA will be actively involved in the discovery process in this litigation, including,  
25 but not limited to, the document collection process. PERA could and would participate in a  
26 deposition at the appropriate time.

27 \_\_\_\_\_  
28 <sup>1</sup> Capitalized terms herein have the same meaning as in the Motion.

1           8.       PERA is committed to actively directing this litigation to maximize the recovery of  
2 the Class. As Court-appointed Lead Plaintiff, PERA understands the fiduciary duties it owes to all  
3 members of the proposed Class to provide fair and adequate representation. PERA will continue  
4 to work with LKS to maximize recovery for the proposed Class.

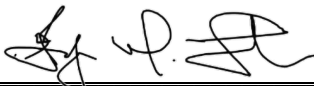
5           9.       PERA will continue to direct this litigation by, including but not limited to,  
6 attending hearings, depositions, and/or trial, and overseeing the preparation and filing of pleadings,  
7 as necessary.

8           10.      PERA seeks appointment of LKS as Class Counsel based on its substantial  
9 experience and expertise in prosecuting securities class actions. PERA believes that LKS possesses  
10 the necessary skills, resources, and ability to prosecute this case vigorously and effectively on  
11 behalf of the proposed Class.

12          11.      Beyond its pro rata share of any recovery, PERA will not accept payment for  
13 serving as a Class Representative, except the reimbursement of such reasonable costs and expenses  
14 (including lost wages) directly relating to the representation of the proposed Class as ordered or  
15 approved by the Court.

16           I declare under penalty of perjury, under the laws of the United States, that the foregoing  
17 is true and correct.

18 Executed this 23<sup>rd</sup> day of December 2024, in Taos, New Mexico.

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22 \_\_\_\_\_  
23 Greg Trujillo  
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# EXHIBIT A

PG&E CORP. Common Stock				
Ticker	CUSIP		SEDOL	ISIN
PCG	69331C108		2689560	US69331C1080
Transaction Type	Trade Date	Shares / Par Value	Price Per Share / Par Value	Cost / Proceeds
Purchase	06/03/15	1,000.00	\$51.97	(\$51,970.00)
Purchase	06/03/15	2,000.00	\$51.97	(\$103,940.00)
Purchase	07/13/15	2,500.00	\$51.15	(\$127,872.75)
Purchase	03/10/16	1,100.00	\$56.95	(\$62,645.99)
Purchase	06/24/16	3,200.00	\$62.66	(\$200,512.00)
Purchase	08/09/16	94,400.00	\$63.60	(\$6,004,113.76)
Sale	08/25/16	-54.00	\$63.56	\$3,432.41
Sale	08/25/16	-1,691.00	\$63.58	\$107,512.43
Purchase	08/25/16	11,768.00	\$63.66	(\$749,143.82)
Sale	08/26/16	-1,315.00	\$62.99	\$82,826.06
Sale	08/26/16	-1,503.00	\$63.08	\$94,803.98
Sale	08/29/16	-376.00	\$62.50	\$23,500.00
Sale	08/29/16	-1,865.00	\$62.55	\$116,646.98
Sale	08/30/16	-1,878.00	\$62.04	\$116,508.87
Sale	08/31/16	-126.00	\$61.80	\$7,786.99
Purchase	08/31/16	74,700.00	\$61.94	(\$4,627,052.46)
Purchase	09/27/16	6,153.00	\$63.80	(\$392,539.25)
Purchase	10/20/16	8,307.00	\$60.96	(\$506,386.41)
Purchase	11/08/16	700.00	\$62.02	(\$43,414.00)
Sale	11/17/16	-8,258.00	\$58.72	\$484,925.45
Sale	11/17/16	-227.00	\$58.96	\$13,383.38
Sale	11/17/16	-7,285.00	\$59.03	\$430,058.32
Sale	11/18/16	-4,630.00	\$58.40	\$270,409.59
Purchase	11/22/16	6,224.00	\$59.28	(\$368,962.45)
Sale	11/29/16	-4,519.00	\$60.69	\$274,260.37
Sale	11/30/16	-2,288.00	\$59.21	\$135,469.51
Sale	12/01/16	-1,197.00	\$57.90	\$69,308.57
Sale	12/02/16	-796.00	\$58.32	\$46,424.55
Purchase	12/13/16	7,217.00	\$60.40	(\$435,937.11)
Sale	01/06/17	-3,108.00	\$60.84	\$189,090.72
Sale	01/06/17	-8,392.00	\$60.97	\$511,683.74
Purchase	01/20/17	10,349.00	\$61.41	(\$635,532.09)
Purchase	02/13/17	400.00	\$63.69	(\$25,476.00)
Purchase	02/24/17	7,378.00	\$65.95	(\$486,588.69)
Sale	03/08/17	-4,763.00	\$65.24	\$310,739.07
Sale	03/09/17	-1,809.00	\$65.29	\$118,105.63
Sale	03/10/17	-928.00	\$65.35	\$60,648.33
Purchase	03/22/17	1,010.00	\$67.57	(\$68,241.56)
Sale	04/07/17	-8,900.00	\$67.11	\$597,294.13
Purchase	04/10/17	50,200.00	\$66.93	(\$3,359,735.40)
Purchase	05/25/17	5,600.00	\$66.80	(\$374,085.04)
Sale	05/31/17	-427.00	\$68.38	\$29,198.26
Sale	05/31/17	-1,710.00	\$68.38	\$116,929.80
Purchase	06/06/17	2,323.00	\$68.74	(\$159,680.93)
Purchase	06/30/17	11,240.00	\$66.61	(\$748,694.15)
Purchase	07/24/17	1,168.00	\$67.90	(\$79,307.20)

EXHIBIT A

CASE No. 5:18-cv-03509-EJD

PG&E CORP. Common Stock				
Ticker	CUSIP		SEDOL	ISIN
PCG	69331C108		2689560	US69331C1080
Transaction Type	Trade Date	Shares / Par Value	Price Per Share / Par Value	Cost / Proceeds
Purchase	08/31/17	1,700.00	\$70.30	(\$119,510.51)
Sale	10/10/17	-8,637.00	\$69.16	\$597,294.33
Sale	10/11/17	-977.00	\$69.08	\$67,494.38
Sale	10/11/17	-4,936.00	\$69.30	\$342,064.80
Purchase	10/30/17	4,180.00	\$57.23	(\$239,222.65)
Sale	11/20/17	-2,900.00	\$52.65	\$152,685.00
Sale	11/30/17	-13,862.00	\$54.24	\$751,874.88
Sale	11/30/17	-41,586.00	\$54.24	\$2,255,624.64
Sale	11/30/17	-7,887.00	\$54.25	\$427,869.75
Sale	12/01/17	-15,727.00	\$54.28	\$853,636.40
Sale	12/04/17	-9,743.00	\$54.13	\$527,404.18
Sale	12/05/17	-12,339.00	\$53.54	\$660,590.58
Sale	12/06/17	-2,135.00	\$53.53	\$114,282.07
Sale	12/07/17	-4.00	\$53.01	\$212.03
Sale	12/08/17	-665.00	\$53.19	\$35,369.69
Sale	12/15/17	-5,000.00	\$53.05	\$265,250.00
Sale	01/31/18	-2,040.00	\$41.79	\$85,260.37
Sale	02/21/18	-500.00	\$39.79	\$19,895.00
Purchase	04/16/18	5,859.00	\$45.08	(\$264,123.72)
Purchase	04/16/18	94.00	\$45.30	(\$4,257.97)
Purchase	04/16/18	40,480.00	\$45.50	(\$1,842,026.21)
Purchase	04/17/18	3,307.00	\$45.91	(\$151,838.92)
Sale	05/31/18	-24,012.00	\$43.33	\$1,040,439.96
Purchase	06/25/18	1,100.00	\$42.10	(\$46,307.03)
Sale	06/20/18	-22,400.00	\$40.00	\$896,000.00
Sale	06/20/18	-1,600.00	\$40.00	\$64,000.00
Purchase	08/20/18	1,700.00	\$44.80	(\$76,163.23)
Sale	08/21/18	-42,400.00	\$44.83	\$1,900,817.44
Purchase	10/11/18	5,228.00	\$46.93	(\$245,358.93)
Purchase	10/11/18	14,772.00	\$47.09	(\$695,682.91)
Sale	10/22/18	-17,750.00	\$47.87	\$849,747.53
Sale	10/23/18	-17,750.00	\$47.47	\$842,539.25

EXHIBIT A

**EXHIBIT B**

<b>PACIFIC GAS &amp; ELECTRIC CO. 5.625% 11/30/2017 DD 12/04/07</b>				
<b>Ticker</b>	<b>CUSIP</b>	<b>SEDOL</b>	<b>ISIN</b>	
	<b>694308GL5</b>	<b>B29T8Z2</b>	<b>US694308GL57</b>	
<b>Transaction Type</b>	<b>Trade Date</b>	<b>Shares / Par Value</b>	<b>Price Per Share / Par Value</b>	<b>Cost / Proceeds</b>
Maturity	11/30/17	-750,000.00	\$100.00	\$750,000.00

<b>PACIFIC GAS &amp; ELECTRIC CO. 8.250% 10/15/2018 DD 10/21/08</b>				
<b>Ticker</b>	<b>CUSIP</b>	<b>SEDOL</b>	<b>ISIN</b>	
	<b>694308GN1</b>	<b>BG191B2</b>	<b>US694308GN14</b>	
<b>Transaction Type</b>	<b>Trade Date</b>	<b>Shares / Par Value</b>	<b>Price Per Share / Par Value</b>	<b>Cost / Proceeds</b>
Corporate Actions	12/29/17	-500,000.00	\$104.71	\$523,568.99
Corporate Actions	02/20/18	-500,000.00	\$103.79	\$518,935.16

<b>PACIFIC GAS &amp; ELECTRIC CO. 3.750% 08/15/2042 DD 08/16/12</b>				
<b>Ticker</b>	<b>CUSIP</b>	<b>SEDOL</b>	<b>ISIN</b>	
	<b>694308HA8</b>	<b>B7MTCC9</b>	<b>US694308HA83</b>	
<b>Transaction Type</b>	<b>Trade Date</b>	<b>Shares / Par Value</b>	<b>Price Per Share / Par Value</b>	<b>Cost / Proceeds</b>
Sales	03/31/17	-250,000.00	\$94.87	\$237,182.50

<b>PACIFIC GAS &amp; ELECTRIC CO. 6.050% 03/01/2034 DD 03/23/04</b>				
<b>Ticker</b>	<b>CUSIP</b>	<b>SEDOL</b>	<b>ISIN</b>	
	<b>694308GE1</b>	<b>B8FPMT8</b>	<b>US694308GE15</b>	
<b>Transaction Type</b>	<b>Trade Date</b>	<b>Shares / Par Value</b>	<b>Price Per Share / Par Value</b>	<b>Cost / Proceeds</b>
Purchase	05/11/16	850,000.00	\$132.53	(\$1,126,471.00)

<b>PACIFIC GAS &amp; ELECTRIC CO. 4.250% 08/01/2023 DD 08/06/18</b>				
<b>Ticker</b>	<b>CUSIP</b>	<b>SEDOL</b>	<b>ISIN</b>	
	<b>694308HZ3</b>	<b>BDG28N9</b>	<b>US694308HZ35</b>	
<b>Transaction Type</b>	<b>Trade Date</b>	<b>Shares / Par Value</b>	<b>Price Per Share / Par Value</b>	<b>Cost / Proceeds</b>
Purchase	08/02/18	1,405,000.00	\$99.77	(\$1,401,698.25)
Sale	11/15/18	-220,000.00	\$89.00	\$195,800.00

<b>PACIFIC GAS &amp; ELECTRIC CO 4.600% 06/15/2043 DD 06/14/13</b>				
<b>Ticker</b>	<b>CUSIP</b>	<b>SEDOL</b>	<b>ISIN</b>	
	<b>694308HD2</b>	<b>BBK3XJ5</b>	<b>US694308HD23</b>	
<b>Transaction Type</b>	<b>Trade Date</b>	<b>Shares / Par Value</b>	<b>Price Per Share / Par Value</b>	<b>Cost / Proceeds</b>
Purchase	06/03/15	125,000	\$101.50	(\$126,875.00)
Sale	08/14/15	-875,000.00	\$103.58	\$906,298.75

EXHIBIT B

<b>PACIFIC GAS &amp; ELECTRIC CO. 3.300% 03/15/2027 DD 03/10/17</b>				
<b>Ticker</b>	<b>CUSIP</b>	<b>SEDOL</b>	<b>ISIN</b>	
	<b>694308HS9</b>	<b>BYXYH72</b>	<b>US694308HS91</b>	
<b>Transaction Type</b>	<b>Trade Date</b>	<b>Shares / Par Value</b>	<b>Price Per Share / Par Value</b>	<b>Cost / Proceeds</b>
Purchases	03/07/17	95,000.00	\$99.65	(\$94,662.75)

EXHIBIT B